

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Claire C. Cecchi
v. : Crim. No. 12-52 (CCC)
WILLAM H. GAUGER III : Protective Order By
: Consent

This application having been opened to the Court by the United States (Preet S. Bharara, United States Attorney for the Southern District of New York (Acting U.S. Attorney pursuant to 28 U.S.C. § 515(a)), by Zahid N. Quraishi and James B. Nobile, Assistant U.S. Attorneys, appearing on behalf of the United States) under Rule 16(d)(1) of the Federal Rules of Criminal Procedure for a protective order limiting disclosure of protected materials that have been and will be provided in discovery to defendant William H. Gauger III (Laurence S. Shtasel, appearing on behalf of the defendant) pursuant to the Court's standing discovery order, namely: (a) tax returns and return information of third parties and (b) personal identification information of third parties (collectively, the "Protected Materials") that have been and will be provided or made available to the defendant, and the Court, having the consent of all parties, and for good cause shown,

IT IS on this 13th day of March, 2012,

ORDERED that:

1. The Protected Materials shall not be disclosed to

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anyone other than the defendant, defendant's counsel and any agent working at the direction of defense counsel in this matter;

2. The Protected Materials only will be used in the preparation of the defense in this case and notwithstanding the provisions of Paragraph 1, the defense shall be permitted to review, with prospective witnesses and their counsel, all materials referenced in Paragraph 1 to the extent necessary to prepare the defense;

3. Notwithstanding any other provision, the defense shall be permitted to disclose any materials provided in Paragraph 1 in connection with the filing of the defendant's motions with the Court, or for use at trial; and

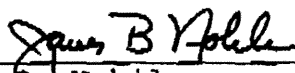
4. If there is a need prior to trial or during trial to disclose the Protected Materials beyond that permitted by this Order, then the defendant will make an application to the Court upon notice to the government, requesting authorization.



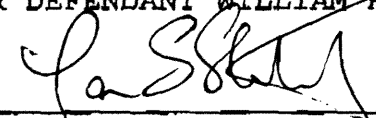
HONORABLE CLAIRE C. CECCHI
UNITED STATES DISTRICT JUDGE

We hereby consent to the form
and entry of this Order

ERIC HOLDER
United States Attorney General
PREET S. BHARARA
United States Attorney
for the Southern District of New York
Acting U.S. Attorney,
pursuant to 28 U.S.C. § 515(a)

By: 
James B. Nobile
Assistant U.S. Attorney

FOR DEFENDANT WILLIAM H GAUGER III:


Laurence S. Shtasel, Esq.
Counsel for defendant William H. Gauger III